

December 28, 2012

## By eFile and Facsimile

Hon. Michael A. Hammer United States District Court for the District of New Jersey Martin Luther King Federal Building and Courthouse 50 Walnut Street Newark, NJ 07101

Re: Wendy Starland v. Rob Fusari, et al.

Civil Action No.: 10-cv-04930 (JLL) (MAH)

Dear Judge Hammer:

We represent non-party Stefani Joanne Germanotta ("Germanotta") in the abovecaptioned matter. We write to respectfully request an extension of time for Germanotta, plaintiff Wendy Starland ("Starland") and defendants Rob Fusari and Rob Fusari Productions LLC (collectively, "Fusari") to file a joint motion to seal the documents noted by Your Honor in Dkt. 219 and 220. All parties consent to this request.

As Your Honor is aware, the parties and Germanotta have agreed to file a single motion to seal, in which all parties and Germanotta will join. As per an order dated December 18, 2012 (Dkt. 224), the joint motion is to be filed today, December 28, 2012. Unfortunately, we were informed that, due to an illness, counsel for Fusari will not be able to review and approve the motion papers in time to file same today. We therefore respectfully request an extension of time through and including Friday, January 4 to file the joint motion. Thank you for your consideration of our request.

Respectfully submitted,

Sandra A. Crawshaw-Sparks

South a. Crumba Sparks 1428

James C. DeZao, Esq. cc: William Dunnegan, Esq.

Sandra A. Crawshaw-Sparks Member of the Firm d 212.969.3915 f 212.969 2900 scrawshaw@proskauer.com www.proskauer.com